

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

**ASHLEY BOSHEA, ADMINISTRATOR  
OF THE ESTATE OF DAVID JOHN  
BOSHEA,**

**Plaintiff,**

**v.**

**COMPASS MARKETING, INC.**

**Defendant.**

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**Case No. 1:21-CV-00309-ELH**

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**MOTION TO DEEM RESPONSE TIMELY FILED**

Ashley Boshea, Administrator of the Estate of David John Boshea (“David Boshea”) respectfully requests that the Court deem the Response to Motion Defendant Compass Marketing, Inc.’s Motion for Relief from a Judgment, or, in the Alternative, for a New Trial filed at 12:02 am on September 25, 2025 filed as timely. In support, David Boshea states:

1. Compass Marketing, Inc. filed its Motion for Relief from a Judgment, or, in the Alternative, for a New Trial on September 10, 2025, which required a response to be filed by the close of business on September 24, 2025.

2. David Boshea’s counsel was scheduled to commence a trial on September 25, 2025 the Circuit Court of Cook County, Illinois, County Department, Chancery Division, concerning Coachhouse Owners, et al., v. Team Schiller Condominiums Condominium Association, Case No. 2021 CH 05839. The case settled on September 24, 2025.

3. Counsel also had two pleadings due on the same day in MELISSA HOVEY, et. al., v. Robert E. Hovey, Jr., Case No. 2025CH05044, which pends in the Circuit Court of Cook County, Illinois, County Department, Chancery Division.

4. Counsel spent the period between the filing of Compass Marketing, Inc.'s motion and September 24, 2025 working vigorously on the above matters and other cases.

5. David Boshea's counsel, only a short time before the end of the day, recalled that this Court's day ends at 12:00 EDT, which is an hour earlier in Chicago. When counsel filed the Response to Motion Defendant Compass Marketing, Inc.'s Motion for Relief from a Judgment, or, in the Alternative, for a New Trial, it would have been well within the close of business in Chicago, but was two minutes late in Baltimore.

6. David Boshea now seeks an order from the court deeming the response timely filed.

7. David Boshea's counsel has conferred with Compass Marketing, Inc.'s attorneys, who have no objection to the relief sought.

WHEREFORE, Ashley Boshea, Administrator of the Estate of David John Boshea, respectfully requests that this Court grant this Motion and deem the Response to Motion Defendant Compass Marketing, Inc.'s Motion for Relief from a Judgment, or, in the Alternative, for a New Trial, accompanying exhibits, and proposed order timely.

Dated: October 6, 2025

**RESPECTFULLY SUBMITTED,**

/s/ Gregory J. Jordan

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COUNSEL FOR DAVID J. BOSHEA

**CERTIFICATE OF SERVICE**

I certify that on October 6, 2025, Ashley Boshea, as the administrator of the Estate of David J. Boshea, served her Motion to Deem Response Timely Filed through the Court's CM/ECF system on:

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*Attorneys for Compass Marketing, Inc.*

/s/ Gregory J. Jordan  
Gregory J. Jordan